

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

Drafted Date: October 16, 2014
 Finalized Date: October 23, 2014

SUBJECT: Partial Compliance Evaluation of Buckeye Terminal, Wethersfield, CT

FROM: Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit *EAR*

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit *CMS 10/23/14*

TO: File

I. Facility Information

- A. Facility Name: Buckeye Terminal
- B. Facility Location: 50 Burbank Road, Wethersfield, CT
- C. Facility Mailing Address: same
- D. Facility Contact: Bill Klick, Lead Terminal Operator
- E. Type of Source (major/minor/sm/sm80): SM80
- F. Date Title V permit issued: NA
- G. AFS #: 0900300195

II Background Information

- A. Date of inspection: September 17, 2014
- B. Weather Conditions: partly cloudy, temperatures in the 70's
- C. US EPA Representative(s):
 Beth Kudarauskas, Air Tech Unit, OES
 Bill Osbahr, OEME
 Mike Looney, OEME
 Jerome Keefe, OEME
- D. State Representative(s):
 none
- E. Federal Requirements Discussed
 40 CFR Part 63 Subpart R
 40 CFR Part 63 Subpart BBBBBB
 40 CFR Part 60 Subpart XX

III Purpose of Inspection

The purpose of this inspection was to conduct monitoring to determine whether excess VOC emissions were being emitted from the facility.

EPA also used the inspection to gather information on the storage and distribution of #6 oil and asphalt at the terminal.

IV Facility Description

A. Company / Facility History

The Buckeye Terminal in Wethersfield, CT is a petroleum storage and distribution terminal. Products stored on-site include gasoline, ethanol, diesel, and home heating oil. The terminal is equipped with a vapor recovery unit to control emissions from the storage and distribution of gasoline and ethanol.

B. Corporate Structure and CEO/President/owner name and mailing address

Buckeye purchased the Wethersfield, CT terminal in 2008. Buckeye now owns the terminal, however, Sprague owns the product in the tanks.

C. Number of Employees and Working Hours

The facility loading operations are conducted 24 hours a day, 7 days a week. Buckeye's Terminal Division in Wethersfield, CT has 2 employees. Buckeye also has a Pipeline Division at the Wethersfield, CT location which employs 12 people.

V Inspection

A. Entry

The inspectors arrived unannounced at the Buckeye Terminal facility located on Burbank Road at 9:10 am. The EPA inspectors (Ms. Kudarauskas, Mr. Looney and Mr. Osbahr) showed their credentials to Mr. Bill Klick, the Lead Terminal Operator.

B. Opening Conference

Ms. Kudarauskas explained that the purpose of the inspection was to determine Buckeye's compliance with Clean Air Act Regulations. In addition, Mr. Osbahr and Mr. Looney discussed the monitoring equipment that they planned to use, including the forward looking infra-red ("FLIR") camera.

Products stored at Buckeye's Wethersfield terminal include gasoline (premium and regular), ethanol, heating oil, and diesel.

The Buckeye terminal receives most products by pipeline. The facility is connected to the Buckeye Pipeline which runs from New Haven, CT to Springfield, MA. The Wethersfield, CT facility is capable of moving product in and out via pipeline. All ethanol at the Buckeye facility is received by truck.

Mr. Klick stated that there is no barge loading or unloading of products at the terminal. The facility dock is no longer used and is in caretaker status. All gasoline leaves the facility by trucks (through the facility loading rack) or by pipeline. There is no #6 oil or asphalt stored at the Buckeye facility.

The facility has one regular gasoline storage tank and one ethanol storage tank. These tanks are equipped with an internal floating roof. Mr. Klick stated that the gasoline business at the Wethersfield terminal has been declining as more trucks are travelling to New Haven, CT or Springfield, MA. Buckeye does not have a fleet of trucks.

The facility has a truck loading rack with 6 bays connected to a vapor recovery unit ("VRU"). Mr. Klick stated that the carbon unit was replaced in 2009, shortly after Buckeye purchased the facility.

C. Plant Walkthrough

The inspectors conducted a focused walkthrough of Buckeye's Wethersfield Terminal on September 17, 2014.

The inspectors began at the loading rack. During the inspection the inspectors were able to observe several trucks loading gasoline. The EPA inspectors were able to monitor pressure and use the FLIR camera to observe any leaks in the facility vapor collection system.

The inspectors attached a coupling with a pressure monitor to the vapor line at the truck loading rack. This device allows the inspectors to measure pressure in the vapor collection system. The inspectors observed the pressure in several loading bays, including Bay F, the bay farthest from the VRU. The inspectors were also able to observe pressure in the vapor line while three trucks were loading gasoline. The maximum pressure the inspectors observed during the inspection was 5.4 inches of water column.

Using the FLIR, Mr. Osbahr did not detect any leaks at the loading rack while the trucks were loading. Mr. Osbahr also observed the facility pressure vacuum relief vent ("PVRV") using the FLIR while trucks were loading product at the rack. The FLIR did not detect any vapors from the PVRV. The VRU was operating at the time of the inspection.

D. Records Review

Mr. Looney requested a copy of the facility site plan.

The inspectors reviewed the pressure measurements that were taken as well as the FLIR videos that were collected.

E. Closing Conference

The inspectors conducted a brief closing conference at the end of the inspection. The inspectors reviewed the FLIR video with Mr. Klick. The videos revealed that no significant vapor leaks were detected at the facility loading rack using the FLIR camera.

The inspectors encouraged Mr. Klick to verify the pressure setting on the facility PVRV, stating that although no VOCs were observed during the inspection, the pressure requirement on the PVRV is 18 inches of water.

The inspectors thanked Mr. Klick for his time and left the facility at approximately 4:00 pm.